

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT NORTH CAROLINA  
DURHAM DIVISION

In re: )  
Moore Properties of Person County, LLC ) Case No: B-20-80081  
Debtor )  
)

OBJECTION OF BANKRUPTCY ADMINISTRATOR TO DEBTORS' DESIGNATION AS  
SMALL BUSINESS DEBTOR

Now comes the United States Bankruptcy Administrator, by and through counsel, and, pursuant to Federal Rule of Bankruptcy Procedure 1020(b) and 11 U.S.C. § 101(51D), objects to the Debtors' designation as Small Business status. In support hereof, the Bankruptcy Administrator respectfully shows unto the Court as follows:

1. On February 10, 2020, the above referenced Debtor filed a Chapter 11 petition for relief with this Court.
2. The Debtor continues to operate as debtor in possession.
3. The Debtor did identify as a small business debtor on the petition; however, based on a review of the schedules and statements, the Debtor is not a small business debtor as that term is defined in 11 U.S.C. § 101(51D).
4. The Bankruptcy Administrator therefore objects to the designation as small business. The Bankruptcy Administrator respectfully requests entry of an order finding that the statement of the Debtor regarding it is a small business debtor is incorrect.

Respectfully submitted, this the 13<sup>th</sup> day of February, 2020.

WILLIAM P. MILLER, ESQ.  
U.S. BANKRUPTCY ADMINISTRATOR

By: s/William P. Miller  
N. C. State Bar No. 9364  
101 S. Edgeworth Street  
Greensboro, NC 27401  
(336) 358-4170

**CERTIFICATE OF SERVICE**

The undersigned certifies that on February 13, 2020, copy of the OBJECTION OF THE BANKRUPTCY ADMINISTRATOR TO DEBTORS' SMALL BUSINESS DESIGNATION was served upon the following via electronic service or by US Mail, where indicated:

James C. White                      via electronic service

Waddell Richmond  
DBA Richmond's Lawn Service  
Attn: Managing Agent, Officer, Director  
796 Wheelers Church Rd.  
Hurdle Mills, NC27541

Person County Tax Collector  
Attn: Managing Agent  
PO Box 1701  
Roxboro, NC 27573

Carolina Farm Credit, ACA  
Attn: Jon Almond  
PO Box 1827  
Statesville, NC 28625

Flat River Hemp Company  
Attn: Managing Agent, Officer, Director  
500 Westover Drive Suite 8561  
Sanford, NC 27330

U. S. BANKRUPTCY ADMINISTRATOR

By : s/ Susan Gattis  
Bankruptcy Analyst